

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK-----X  
UNITED STATES OF AMERICA

-v-

MICHAEL O'FLAHERTY,

STIPULATION IN SUPPORT  
OF APPLICATION FOR  
8<sup>TH</sup> OR SUBSEQUENT  
ORDER OF CONTINUANCE AND  
8<sup>th</sup> ORDER OF CONTINUANCE

Defendant.

24 Mag. 4070  
-----X

The United States of America and the defendant jointly request and agree that the time period from **7/2/2025 to 7/30/2025** be excluded from the computation of the period within which an information or indictment must be filed, pursuant to Title 18, United States Code, Section 3161(b) and (h)(7).

Michael O'Flaherty, the defendant, was charged with violations of Title 18, United States Code, Sections 1512(b) (obstruction of justice), 1001 (false statements), and 2 (aiding and abetting), in a complaint dated November 20, 2024. The defendant was arrested on November 21, 2024, presented the same day before the Honorable Victoria Reznik, and released on bail with the Government's consent principally based on a \$50,000.00 personal recognizance bond cosigned by two financially responsible persons.

The parties submit that there is good cause for an additional exclusion of time because the parties are exploring a possible disposition of this case prior to trial. On or about January 14, 2025, the Government produced multiple gigabytes' worth of preindictment discovery to the defendant. On or about March 27, 2025, the defendant replaced his prior counsel on this matter with the new counsel identified below. Since then, the parties have engaged in discussions regarding the discovery produced in this matter and the possibility of a pretrial disposition. An additional exclusion of time would permit the defendant to continue to review the discovery produced to date and for the parties to continue discussions regarding a preindictment resolution.

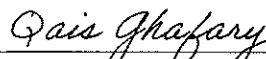
By the following signatures we agree and consent to the exclusion of time noted above:



Defendant's Counsel  
Howard Tanner, Esq.

6-25-25

Date



Assistant U.S. Attorney  
Qais Ghafary

6-25-25

Date

The defendant states that he has been fully advised by counsel of his rights guaranteed under (a) of the Sixth Amendment to the Constitution; (b) the Speedy Trial Act of 1974, as set forth in Title 18, United States Code, Sections 3161-74; and (c) the plans and rules of this Court adopted pursuant to that Act. The defendant understands that he has a right to be charged by indictment or information, and to have a trial before a judge or jury, within a specified time (excluding certain time periods) under the Constitution and Rules and Laws of the United States identified above. The defendant consents and agrees to the above request.

/s/ Michael O'Flaherty (Signed by counsel) 6-25-25

Defendant


Date

MICHAEL O'FLAHERTY

The joint application of the United States of America and the defendant having been heard at a proceeding on the date below, the time period from 7/2/2025 to 7/30/2025 is hereby excluded in computing the time within which an indictment or information must be filed. The Court grants this continuance on the finding that the ends of justice outweigh the interests of the public and the defendant in a speedy trial, for the reasons set forth above. The Court further orders: N/A

Dated: 7/2/25  
White Plains, New York

**SO ORDERED**

  
United States Magistrate Judge  
Southern District of New York